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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re
META MATERIALS INC.,
Debtor.

Case No.: 24-50792-hlb
(Chapter 7)

**STIPULATION ON BRIEFING SCHEDULE AND
HEARING DATE FOR NON-PARTIES CITADEL
SECURITIES LLC, ANSON FUNDS
MANAGEMENT LP, AND VIRTU FINANCIAL,
LLC'S MOTION TO QUASH AND/OR FOR A
PROTECTIVE ORDER**

Current Hearing Date: September 4, 2025
Current Hearing Time: 10:00 a.m.

**Proposed Hearing Date: October 30, 2025
Proposed Hearing Time: 10:30 a.m.**

WHEREAS, in relation to the above-captioned bankruptcy proceedings (the "Action"),
Chapter 7 Trustee Christina Lovato ("Trustee") and third-party subpoena respondents Citadel

1 Securities LLC, Anson Funds Management LP, and Virtu Financial, LLC (“Non-Parties”) hereby
2 agree to the following Stipulation and respectfully request that the Court enter the [Proposed]
3 Order Approving Stipulation on Briefing Schedule and Hearing Date for Non-Party Citadel
4 Securities LLC, Anson Funds Management LP, and Virtu Financial, LLC’s Motion to Quash
5 and/or For a Protective Order, filed herewith (the “[Proposed] Order”), resetting the schedule for
6 briefing and a hearing on the Non-Parties’ Motion to Quash and/or For a Protective Order, ECF
7 No. 2088 *et seq.* (Aug. 5, 2025) (the “Motion”), the schedule for which is currently set forth in the
8 Notice of Hearing on the Motion filed by the Non-Parties, ECF No. 2093 (Aug. 7, 2025) (the
9 “Notice of Hearing”);

10 **WHEREAS**, the Trustee served subpoenas on each of the three Non-Parties seeking
11 production of documents and deposition testimony (the “Subpoenas”);

12 **WHEREAS**, on August 5, 2025, after correspondence and meet and confers, the Non-
13 Parties filed their Motion, seeking to quash the Subpoenas and/or to obtain a protective order with
14 respect thereto;

15 **WHEREAS**, on August 7, 2025, the Non-Parties filed their Notice of Hearing, specifying
16 that “on September 4, 2025 at 10:00 a.m. Pacific Time, a hearing will be conducted” on the Non-
17 Parties’ Motion;

18 **WHEREAS**, the Trustee’s forthcoming opposition to the Non-Parties’ Motion (the
19 “Opposition”) is presently due on Thursday, August 21, 2025, pursuant to Local Rule 9014(d)(1),
20 which provides that “opposition to a motion must be filed, and service of the opposition must be
21 completed on the movant, no later than fourteen (14) days preceding the hearing date for the
22 motion” (as cited in the Notice of Hearing);

23 **WHEREAS**, any reply memorandum filed by the Non-Parties in support of their Motion
24 (the “Reply”) is presently due on Thursday, August 28, 2025, pursuant to Local Rule 9014(d)(2),
25 which provides that “any reply memorandum must be filed and served no later than seven (7) days
26 preceding the hearing date”;

27 **WHEREAS**, counsel for the Trustee has requested to extend the current briefing schedule
28 and hearing date on the Motion, given the current imminent deadline of Thursday, August 21, 2025

1 for the Trustee's Opposition;

2 **WHEREAS**, the Non-Parties agree to the Trustee's request for an extension of the hearing
3 date on the Motion, and necessarily for extended dates to file the Opposition and Reply;

4 **NOW, THEREFORE**, the Parties, through their undersigned counsel, hereby stipulate to
5 and confirm the following:

- 6 1. The remote Zoom hearing on the Motion shall be continued from September 4, 2025
7 to October 30, 2025 at 10:30 a.m.;
- 8 2. Any opposition to the Motion shall be filed and served by September 23, 2025;
- 9 3. Any reply in support of the Motion shall be filed and served no later than October 23,
10 2025; and
- 11 4. The Parties certify that the above requested continuance and modified briefing
12 schedule is made in good faith and not for delay or any other improper purpose.

13 **Date: August 20, 2025**

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15 *[Signature blocks appear on following page]*
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5 **Attorneys for Chapter 7 Trustee Christina Lovato**

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